

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MARTIN O. LONG,

*

Plaintiff,

*

vs.

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Case Number: 2:06cv816-MHT

STATE FARM FIRE AND
CASUALTY COMPANY,

*

*

Defendant.

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff and Defendant move the Court for an extension of time to complete discovery and for the trial setting of this case and, as grounds, set forth the following:

1. Discovery cutoff is the last day of May.
2. The parties have earnestly pursued discovery. To that end, the parties have exchanged thousands of pages of documents, have obtained and disclosed information concerning expert witnesses, have taken seven depositions and have propounded and answered interrogatories. Discovery disputes have been handled without Court involvement.
3. Counsel for both parties have had other matters which have resulted in scheduling problems and time limitations.
4. The corporate representative for State Farm Fire and Casualty Company, Mr. Tony Nix, has a pre-planned vacation, which has been paid for in advance, from July 26 through August 10.

5. Additional time is needed to accomplish the following items:

- a. Depositions of experts of both parties.
- b. Depositions of fact witnesses who are beyond the subpoena power of this Court and may be unable to testify live.
- c. Additional discovery depositions of Defendant's employees.

6. Both parties therefore move the Court to extend the time to complete discovery for an additional 90 days and to reschedule the trial setting accordingly.

Done this 1st day of May, 2007.

s/ F. Tucker Burge ¹
F. TUCKER BURGE
Attorney for Plaintiff Martin O. Long

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¹ Attorney F. Tucker Burge has given permission for his signature to be affixed to this document for filing with the Court.